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BURNT ENDS, LLC, RODERICK C. FLINT AND
JOSHUA M. FINE

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

R. BOWMAN and D. MOUSSEAU,
individually, and on behalf of all others
similarly situated

Plaintiffs,

v.

BURNT ENDS, LLC, a California
Limited Liability Company;
RODERICK C. FLINT, an individual;
JOSHUA M. FINE, an individual; and
DOE 1 through and including DOE 10,
Defendants.

Case No: 2:17-cv-05782-RGK-SS

*Assigned to Hon. R. Gary Klausner and
Magistrate Judge Suzanne H. Segal*

**DECLARATION OF VICKIE V.
GRASU IN SUPPORT OF
DEFENDANTS RODERICK C. FLINT
AND JOSHUA M. FINE'S MOTION
TO DISMISS PURSUANT TO
FEDERAL RULES OF CIVIL
PROCEDURE, RULE 12B6**

Date: January 22, 2018

Time: 9:00 a.m.

Judge: Honorable R. Gary Klausner
Ctm: 850

Complaint Filed: August 4, 2017

DECLARATION OF VICKIE V. GRASU

I, VICKIE V. GRASU, declare and state as follows:

1. I am an attorney licensed to practice law in the State of California and admitted to practice before this Court. I am a partner with LeClairRyan LLP, counsel of record for Defendants BURNT ENDS, LLC, RODERICK C. FLINT

1 AND JOSHUA M. FINE MATHESON TRI-GAS, INC. in this action. I make this
2 Declaration in support of Defendants Roderick C. Flint (“Flint”) and Joshua M.
3 Fine’s (“Fine”) Motion to Dismiss pursuant to Federal Rules of Civil Procedure,
4 Rule 12b6. I have personal knowledge of the following facts. If called upon as a
5 witness, I could and would testify competently thereto.

6 2. On October 24, 2017, I spoke with Plaintiffs’ counsel Alan Harris and
7 conferred regarding the claims against the individual Defendants Flint and Fine.
8 Plaintiffs’ counsel was not willing to dismiss the individual Defendants from this
9 action.

10 I declare under penalty of perjury under the laws of the United States of
11 America and the State of California that the foregoing is true and correct.

12 Executed on November 28, 2017, at Los Angeles, California.

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16 VICKIE V. GRASU
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